

TOMPKINS, MCGUIRE, WACHENFELD & BARRY, LLP

Counselors at Law

3 BECKER FARM ROAD, SUITE 402
ROSELAND, NEW JERSEY 07068-1726
Roseland (973) 622-3000
New York (212) 714-1720

James J. O'Hara
Partner

FAX (973) 623-7780
www.tompkinsmcguire.com

Direct Line (973) 623-7041
johara@tompkinsmcguire.com

March 30, 2022

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant Samsung Electronics America, Inc. ("SEA") in the above-referenced matter. As per Your Honor's direction in the Order of February 16, 2022, we are providing a joint status report.

An extended mediation with the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) resulted in a Settlement Agreement between the parties. The parties continue to work jointly to effectuate the settlement and enlist Judge Cavanaugh's assistance as needed. We respectfully propose updating the Court again in June 2022.

Respectfully,

/s/ James J. O'Hara

JAMES J. O'HARA
On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Kevin Laukaitis

KEVIN LAUKAITIS
On behalf of Plaintiffs

cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)